U. S. Steel
Clairton Works
400 State Street
Clairton, PA 15025-1855

February 28, 1996

Mr. David B. McGuigan, Ph.D.
Chief, Air Enforcement Section
United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107-4431

Subject: U.S. Steel Clairton Works
Modifications and Improvements to Igniter Pilot Systems

Dear Mr. McGuigan:

Our September 15, 1995 submittal of our consultant's report enumerated the steps which we had taken to improve the reliability of our battery igniter flare system. It also listed additional changes which at that time were anticipated. The tasks identified in our submittal and the current status of those tasks are listed below:

- Install a revised size gas nozzle on one pilot (of three) of each of the flare stacks at the second unit batteries. Implementation was anticipated to be complete by November 15, 1995.

  Status: The second unit gas nozzle replacement was completed by November 15, 1995.

- Install revised gas nozzles on all batteries. Implementation was anticipated to be complete by February 29, 1996.

  Status: Revised gas nozzle replacement was completed on February 23, 1996.

- Additional pipe taps were to be installed on pilot lines to test air/fuel ratios. Implementation was anticipated to be complete by December 15, 1995.

  Status: The pipe tap installation was completed by December 15, 1995.

All revisions and modifications have been completed. We anticipate that flare performance will continue to be good. Our recent performance is summarized below.

Month	Pilots out of Service (Hr:Min)	Online %*
September, 1995	00:00	100%
October, 1995	00:00	100%
November, 1995	00:00	100%
December, 1995	00:00	100%
January, 1996	00:55	99.99%

*Based on hours flares were unavailable due to pilot problems versus battery operating hours.

We have now operated through the winter, which historically had been the problem time of year, with excellent performance. We experienced only one incident during January which was the result of a slow steam leak from a cleanout line into the ignitor pilot lines. The steam leak caused the line to freeze and choke off the pilot gas. This performance contrasts with the performance of the previous winter reported in our September 15 letter, when January's online percentage was 99.44% and February's was 99.94%. The excellent performance is the result of the significant efforts spent to improve the flare reliability.

If you have any questions, please call me at (412) 233-1101.

Sincerely,

H. R. McCollum
Manager, Environmental Control

HRM/kb-96057
cc: Michael Ioff
Bill Gilson, ACHD